

1 NANCY SCHROEDER (SBN 280207)  
2 (nancy.schroeder@wilmerhale.com)  
3 WILMER CUTLER PICKERING  
4 HALE AND DORR LLP  
5 350 S. Grand Ave., Suite 2100  
6 Los Angeles, CA 90071  
7 Telephone: +213 443 5300  
8 Facsimile: +213 443 5400

9 LOUIS W. TOMPROS (*pro hac vice*)  
10 (louis.tompros@wilmerhale.com)  
11 STEPHANIE LIN (*pro hac vice*)  
12 (stephanie.lin@wilmerhale.com)  
13 WILMER CUTLER PICKERING  
14 HALE AND DORR LLP  
15 60 State Street  
16 Boston, MA 02109  
17 Telephone: +1 617 526 6000  
18 Facsimile: +1 617 526 5000

19 *Attorneys for Plaintiff Matt Furie*

20 **IN THE UNITED STATES DISTRICT COURT**  
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 MATT FURIE,

23 Plaintiff,

24 vs.

25 INFOWARS, LLC; FREE SPEECH  
26 SYSTEMS, LLC,

27 Defendants.

2:18-cv-01830-MWF-JPR

**DECLARATION OF STEPHANIE  
LIN IN SUPPORT OF  
DEFENDANTS' APPLICATION  
TO FILE UNDER SEAL (DKT. 103)**

Date: May 6, 2019

Time: 10:00 a.m.

Hon. Michael W. Fitzgerald

Case Filed: March 5, 2018

Trial Date: July 16, 2019

DECLARATION OF STEPHANIE LIN  
Case No. 2:18-cv-01830-MWF-JPR

1 I, Stephanie Lin, declare under penalty of perjury that:

2 1. I am a senior associate at the law firm of Wilmer Cutler Pickering  
3 Hale and Dorr LLP. I am counsel for Plaintiff Matt Furie.

4 2. I am a member in good standing of the bar of the Commonwealth of  
5 Massachusetts. I have never been suspended, disbarred, sanctioned, or cited for  
6 contempt by any court or administrative body.

7 3. I respectfully submit this declaration in support of Defendant  
8 Infowars, LLC and Free Speech Systems, LLC's (collectively, "Infowars")  
9 Application to File Unredacted Version of Exhibit 1 to Defendants Reply In  
10 Support of Motion For Summary Judgment Under Seal in the above-referenced  
11 matter. This declaration is based upon my personal knowledge.

12 4. On September 5, 2018, the Court issued a protective order in the  
13 above-referenced matter recognizing that this litigation would likely include "the  
14 exchange of confidential and proprietary information, including  
15 . . . communications containing internal business information (including contracts  
16 and financial information) that would be damaging if it were made available to  
17 competitors or prospective business matters." Dkt. 62 at 2-3.

18 5. On April 19, 2019 Alex Shepard, counsel for Infowars, provided  
19 notice of Infowars's intent to file certain of Mr. Furie's confidential information  
20 under seal, per L.R. 79-5. I identified for Mr. Shepard only the most sensitive  
21 information for redaction in order to minimize the amount of information that  
22 would be filed under seal. The highlighted items in the attachment to the  
23 Declaration of Alex J. Shepard (Dkt. 105) accurately reflect the information for  
24 redaction.

1           6.     There is good cause to redact the information Infowars has applied to  
2 file under seal. This information has been designated confidential by Mr. Furie, as  
3 it contains sensitive business information concerning the negotiations and financial  
4 terms of licensing contracts entered into by Mr. Furie. The source of this  
5 information is a document that was produced on a confidential basis under the  
6 protective order.

7           7.     The specific information that Mr. Furie has identified for redaction  
8 and filing under seal is limited to the portion of the document disclosing the  
9 specific payment terms of his license agreement with a third party, similar to the  
10 information at issue in the Court's April 22, 2019 Order (Dkt. 106) granting  
11 Defendants' Application For Leave To File Under Seal. Mr. Furie does not  
12 ordinarily disclose the payment terms of his contracts publicly. Public disclosure  
13 of the specific amounts for which Mr. Furie has licensed his copyrights would  
14 place Mr. Furie at a competitive disadvantage in future licensing negotiations. *See*  
15 April 22, 2019 Order (Dkt. 106) at 2 (citing Fed. R. Civ. P. 26(c); *Nixon v. Warner*  
16 *Commc'ns, Inc.*, 435 U.S. 589, 598 (1978); *Phillips ex. Rel. Estates of Byrd v.*  
17 *General Motors Corp.*, 307 F.3d 1206, 1211 (9<sup>th</sup> Cir. 2002)).

18  
19           Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the  
20 foregoing is true and correct.

21           Executed on April 24, 2019 at Boston, Massachusetts.

22  
23             
24           Stephanie Lin